

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

Orly Taitz,

Plaintiff,

v.

Jeh Johnson et al.,

Defendants.

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CIVIL ACTION NO. 1:14-cv-00119

DEFENDANTS' RESPONSE TO PLAINTIFF'S SUPPLEMENTAL BRIEF

Plaintiff Orly Taitz's recent Supplemental Brief (ECF No. 90) purports to provide "new information" in support of her request for injunctive relief, in the form of two news articles discussing tuberculosis in the refugee populations in Indiana and Minnesota. Neither of the articles affects the main issue remaining in this action: whether Plaintiff, a dentist in California, has established a sufficient causal link between her alleged respiratory ailment and Defendants' allegedly unlawful actions in processing aliens along the Southwest border. *See* ECF No. 69 at 31 (finding that "[t]o the extent she is able, Plaintiff may only seek redress in this Court in connection with her *personal, direct*, health-related injuries.") (emphasis added). Instead, the articles discuss individuals lawfully admitted as refugees in other parts of the country.

With this submission, Plaintiff, despite her lack of standing to do so, persists in inviting this Court to review the Executive Branch's handling of infectious diseases in the foreign-born population. As the Supreme Court recently observed, the standing doctrine developed "to ensure that federal courts do not exceed their authority as it has been traditionally understood." *Spokeo, Inc. v. Robins*, 136 S.Ct. 1540, 1548 (2016). This Court should decline Plaintiff's

invitation to find standing here, and, as set forth in Defendants' Second Motion to Dismiss, or, in the Alternative, Motion for Summary Judgment (ECF No. 74), should dismiss the remainder of the case.

Dated: June 15, 2016

Respectfully submitted,

/s/ Colin A. Kisor
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CERTIFICATE OF SERVICE

I, Colin Kisor, do hereby certify that on June 15, 2016, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

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